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By ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

December 16, 2022

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. I write to update and correct the request earlier today for a one-day extension from December 16, 2022, to December 19, 2022, (Dkt. No. 787) to file defendants' Opposition to Plaintiffs' Motion to Compel dated December 7, 2022 (Dkt. No. 773). While the Court has just granted defendants' request for extension, defendants' filing for the extension and plaintiffs' response to the request crossed, and the undersigned did not see plaintiffs' response until after the filing. Plaintiffs' counsel responded that at 5:00, she would not be able to get the approvals necessary to obtain consent, and as she will likely be the only attorney to draft the reply and as she will be away December 23rd to the 28th, she would not have sufficient time to draft a reply. Further, a previous extension on this matter was requested by a colleague and granted by the Court. Dkt. Nos. 777 and 778. Unfortunately, the extension remains necessary as defense counsel, who have been working diligently on this application, also had other discovery obligations this week, one of which is also due to plaintiffs today. Defendants were hoping to complete the motion today but simply cannot complete the response and obtain the necessary approvals to file the response until Monday, December 19th. Defense counsel wants to correct the record and apologizes for the delay.

Thank you for your consideration herein.

Respectfully submitted,

Amy Robinson s/

Amy Robinson
Senior Counsel

cc: ALL COUNSEL (*via* ECF)